

STIPULATION AGREEMENT

THIS AGREEMENT is entered into by the United States Department of Agriculture, Animal and Plant Health Inspection Service (“APHIS”), Animal Care, and William Brickle (doing business as Bill Brickle’s Wonderland Circus) with reference to the following facts:

I. At all times mentioned herein, William Brickle was a licensed exhibitor under the Animal Welfare Act (7 U.S.C. § 2131 *et seq.*) (the “AWA”), and held AWA license 56-C-0190, in connection with the animal facility located at 118 Utaff Lane, Orangeburg, SC 29115.

II. APHIS has documented evidence of William Brickle’s non-compliance with the AWA and the regulations promulgated thereunder (9 C.F.R. § 1.1 *et seq.*), and specifically, has documented evidence of William Brickle’s repeated failure to not interfere with APHIS officials in the course of carrying out their duties as required by section 2.4 of the AWA regulations and sections 2.50 through 3.14 of the AWA standards for record keeping and the humane handling, care and treatment of dogs (9 C.F.R. §§ 2.4, 2.50-3.14). On June 22, 2010, William Brickle’s AWA license 56-C-0190 was terminated upon his request.

III. APHIS has not instituted an administrative enforcement action based on the findings described above in paragraph II.

IV. APHIS and William Brickle have determined to settle the issues related to the potential violations of the AWA and the regulations and standards issued thereunder, as described above.

NOW, THEREFORE, it is agreed as follows:

A. William Brickle admits that the Secretary has jurisdiction in this matter, and waives oral hearing and further procedure.

B. William Brickle consents and agrees to the following: As of June 22, 2010, AWA license 56-C-0190 is permanently revoked. William Brickle and any partnership, firm, corporation or other legal entity that he controls or in which he has a substantial interest, financial or otherwise, are permanently disqualified from (a) obtaining an Animal Welfare Act license, and (b) engaging in activities governed by the Animal Welfare Act (7 U.S.C. § 2131 *et seq.*) and regulations issued thereunder (9 C.F.R. § 1.1 *et seq.*), either directly or indirectly, on or off 118 Utaff Lane, Orangeburg, SC 29115.

C. William Brickle consents and agrees that his failure to comply with the terms of this agreement shall automatically void paragraph D below, and that APHIS shall have the right to institute enforcement proceedings against William Brickle based upon the non-compliant items documented at 118 Utaff Lane, Orangeburg, SC 29115, in connection with animal welfare investigation SC10008 AC, and any future violations, and to pursue any and all remedies available to APHIS under the AWA.

D. For and in consideration of William Brickle's agreements and actions described in paragraph B above, and the promises and admissions of William Brickle set forth herein, APHIS agrees not to institute an administrative or civil enforcement action against William Brickle in connection with the alleged AWA violations documented in animal welfare investigation SC10008 AC.

APHIS and William Brickle warrant and represent that their respective representatives, whose signatures appear below, have the authority to execute this Agreement and to bind each of the parties, respectively, to this Agreement.

[REDACTED]

Date: _____

U.S. DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICES

[REDACTED]

Date: _____